



County of Yolo

HEALTH DEPARTMENT

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RE: Status Report

CUPA: Yolo County Environmental Health

Date of Evaluation: January 31 - February 1, 2006

State Evaluation Team:

Cal/EPA Team Leader: Kareem Taylor
DTSC Evaluator: Mark Pear
OES Evaluator: Brian Abeel
SWRCB Evaluator: Marcele Christofferson
OSFM Evaluator: Francis Mateo

Deficiencies and Corrective Actions Status Report

1. **Deficiency:** The CUPA is not inspecting all CalARP facilities subject to the surcharge on a triennial basis.

CUPA Corrective Action: Yolo County currently has 16 CalARP facilities, and we have conducted three CalARP inspections since July 1, 2005. We are scheduled to inspect the City of Woodland Wastewater Treatment Plant (FA#5183) on June 27, 2006, and the City of West Sacramento Wastewater Treatment Plant (FA#5377) on June 29, 2006. Six other facilities that have never been inspected will be inspected before January 1, 2007. This will bring us completely up to date with inspections in the CalARP program.

2. **Deficiency:** The CUPA does not regularly evaluate the City of West Sacramento Fire Department and the County Agricultural Commissioner in their implementation of the CUPA Program.

CUPA Corrective Action: Yolo County will include an evaluation of the participating agencies performance during self-audits, the next of which is due to the state on September 30, 2006. To make evaluating the participating agencies easier we have started meeting with the West Sacramento Fire Department and the County Agriculture Department more regularly. We are also working on providing PA access to our scanned facility files.

3. **Deficiency:** The CUPA is not inspecting hazardous waste generators at least once every three years (33% of regulated facilities annually). The CUPA has only identified approximately two-thirds of the hazardous waste generators in the County, based upon a comparison of the County's database and the Hazardous Waste Tracking System (HWTS).

CUPA Corrective Action: Currently Yolo County has identified 567 active hazardous waste generators, and we have inspected 205 hazardous waste generators between July 1, 2005, and June 20, 2006. This exceeds our annual target of 33% of the hazardous waste generators in our database. However, the HWTS currently lists 928 hazardous waste generators in Yolo County, resulting in an annual target of approximately 310 required inspections. Since the audit we have compared the HWTS list of generator facilities with our database and have identified the differences between the two data sources. We hired two new CUPA inspectors (1 replacement, 1 new position) on June 5, 2006, and they have been assigned the task of tracking down hazardous waste generators not currently in our database. Based upon our findings so far, I am expecting that Yolo County actually has about 850 generators and therefore we are planning to inspect 285 hazardous waste generator facilities in FY 2006/2007. The increased staffing in the CUPA program should allow us to meet this goal. To ensure that we include any new hazardous waste generators in our inspection program, I have requested that DTSC provide information to Yolo County whenever they issue/activate an EPA Identification number for a generator in our jurisdiction. DTSC is researching a mechanism for providing that information.

4. **Deficiency:** The CUPA did not reliably ensure that facilities found in violation and issued a Notice to Comply actually returned to compliance and certified that the violations had been corrected.

CUPA Corrective Action: CUPA staff persons have been directed to ensure that there is a written record verifying that all cited violations have been corrected. Facilities not certifying a return to compliance will receive appropriate follow-up, which can include being contacted by the CUPA, follow-up inspections, or enforcement. Staff will not clear a violation in our database without a written certification of compliance or other appropriate documents, such as test results.

5. **Deficiency:** The CUPA is approving UST Plot plans without the required elements. Monitoring plans are not reviewed or updated when requirements change.

CUPA Corrective Action: We have revised all policies and forms for use in the UST program. They are currently in Draft form and will be final soon. The new policies ensure that we will review UST monitoring and plot plans for facilities upon UST installation, during the annual inspection, and prior to issuing an operating permit. These policies and forms will be updated when requirements change. Please see the attached draft documents: ***Underground Storage Tank Application Packet for Installations, Modifications, and Repairs / Underground Storage Tank Program Plan Check Guidance Checklist / Written Monitoring and Response Plan for Underground Storage Tanks / Guidelines for Issuing Annual Underground Storage Tank Permits / Guidelines for Conducting Annual Underground Storage Tank Inspections***

6. **Deficiency:** The Yolo County Area Plan has not been revised since 2001.

CUPA Corrective Action: The CUPA has met with the local fire agencies and a decision has been made to consolidate the various hazmat operations plans in use in the County into one document, the Area Plan. We attended the Area Plan training workshop offered on May 30, 2006, in Hayward, and we intend to include the pesticide drift requirements in our update of the Area Plan. A draft update will be prepared by October 15, 2006, and the final update will be submitted to the State by February 1, 2007.

- 7. Deficiency:** The CUPA has not established a procedure necessary to implement a dispute resolution between the CUPA and stationary sources.

CUPA Corrective Action: A dispute resolution policy has been written, and is attached.

- 8. Deficiency:** The CUPA is not inspecting hazardous materials business plan (HMBP) facilities at least once every three years (33% of regulated facilities annually).

CUPA Corrective Action: Currently Yolo County has identified 961 active HMBP facilities, and we have inspected 294 HMBP facilities between July 1, 2005, and June 20, 2006. That is 30% and it falls just short of our goal of 33% of facilities inspected annually. We are planning to inspect 325 HMBP facilities in FY 2006/2007. The increased staffing in the CUPA program should allow us to meet this goal. In addition, we are developing queries for our database to ensure not only that we inspect one-third of our HMBP facilities in a given year, but also that we inspect those have gone the longest since last being inspected.

- 9. Deficiency:** The CUPA is not inspecting all CalARP Program stationary sources within their jurisdiction at least once every three years.

CUPA Corrective Action: See reply to Deficiency No. 1 above.

Thank you for giving us the opportunity to update CalEPA on our progress correcting noted deficiencies. If you need additional information, please don't hesitate to contact me.

Jeff Pinnow